

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

ROBERT M. NEWTON,

Civil Action No. 2:18-cv-01639-MPK

Plaintiff,

v.

Magistrate Judge Maureen P. Kelly

PENNSYLVANIA STATE POLICE,

Defendant.

JURY TRIAL DEMANDED

**PLAINTIFF'S MOTION FOR BACK PAY, FRONT PAY
AND PREJUDGEMENT INTEREST**

Plaintiff, Robert M. Newton, by undersigned counsel, files the following Motion for Back Pay, Front Pay and Prejudgment Interest, and in support states the following:

1. This is an action pursuant to the Rehabilitation Act of 1973, 29 U.S.C. §794.
2. Plaintiff was forced to retire on September 4, 2020 from his Procurement and Supply Officer position with Defendant, the Pennsylvania State Police.
3. On November 10, 2021, a jury found that Defendant forced Plaintiff to retire because of his disability and awarded compensatory damages. (See ECF Doc. No. 155).
4. Plaintiff now moves for an award of back pay for the time period between September 4, 2020 and November 11, 2021, the date the verdict was rendered, in the amount of \$132,276.
5. Plaintiff also moves for prejudgment interest on the back pay award to reimburse him for the use of his funds from the date of his termination through the date of judgement.
6. Plaintiff also moves for front pay damages including (1) his lost wages from the date of judgment through the date of his mandatory retirement in the amount of

\$1,472,839 and (2) his lost pension benefits resulting from his forced retirement in the amount of \$377,280.

WHEREFORE, Plaintiff respectfully requests that this Court award back pay, front pay and prejudgment interest as set forth more fully in Plaintiff's Brief in Support of Motion for Back Pay, Front Pay and Prejudgment Interest.

Respectfully submitted:



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